## JUSTIFICATION AND APPROVAL FOR EXCEPTION TO FAIR OPPORTUNITY

1. Contracting Activity: Department of Veterans Affairs (VA)

Office of Acquisition Operations Technology Acquisition Center 1701 Directors Blvd, Ste 600

Austin, TX 78744

- 2. <u>Description of Action</u>: This proposed action is for a firm-fixed-price (FFP) delivery order (DO) issued under the National Aeronautics and Space Administration (NASA) Solutions for Enterprise-Wide Procurement (SEWP) IV Government-Wide Acquisition Contract (GWAC) to obtain five QRadar Security Information and Event Management (SIEM) appliances and associated perpetual license upgrades. The 5 QRadar SIEMs include warranty/maintenance. The QRadar SIEM appliances and software license upgrades will be delivered within 30 days after award. The warranty/maintenance will be for a 12 month period commencing upon VA's acceptance of the QRadar SIEM appliances and licenses. The total estimated value of the proposed action is \$676,377.23.
- 3. <u>Description of Supplies or Services</u>: VA's Continuous Readiness Information Security Program (CRISP) requires system security monitoring of all system logs and network connectivity to provide event and log correlation, event alerting and information security threat intelligence, and reporting, for data center systems and networks. Using combined event processors and flow collectors, QFlow Collectors, Event Processors, Flow Processors, and QFlow Collectors, collectively referred to as QRadar brand name SIEM hardware appliances, will meet all of these requirements. The appliances include standard software and licenses; however, license upgrades are needed to obtain improved functionality. Finally, VA requires warranty/maintenance to begin once the five new QRadar SIEM appliances and software license upgrades are accepted; the required warranty/maintenance includes 24/7 telephone and email support, software updates, patches, defect support and parts replacement for one-year.
- 4. Statutory Authority: The statutory authority permitting an exception to fair opportunity is Section 41 U.S.C. 4106(c) as implemented by FAR Subpart 16.505(b)(2)(i)(B), entitled, "Only one awardee is capable of providing the supplies or services required at the level of quality required because the supplies or services ordered are unique or highly specialized."
- 5. Rationale Supporting Use of Authority Cited: Based on market research, as described in paragraph 8 of this document, limited competition is available among authorized resellers for these brand name items. This is a brand name justification in support of FAR 11.105, Items Peculiar to One Manufacturer. No other appliances are interoperable and compatible with the current production QRadar SIEM architecture.

The requirement for VA CRISP compliance applies to the Corporate Data Center Operations (CDCO) SIEM architecture in use at each of the Information Technology Centers (ITCs). Quantico Information Technology Center (QITC) and Capitol Regional Data Center (CRDC) are the two remaining centers of five requiring SIEM appliances. The new QRadar SIEM appliances and software license upgrades must match the existing CDCO QRadar SIEM architecture in use at the other CDCO data centers. The reason is because Austin Information Technology Center (AITC) Security Operations Center (SOC) centrally manages IT security operations of all five CDCO data centers, and they must use the same SIEM architecture from the same centralized SIEM console. No other appliances will be capable of working with the current architecture, connectivity, licensing, and management within CDCO's production QRadar SIEM architecture and configuration.

VA has a significant investment in its security operations architecture. If any other brand name appliances were to be introduced, VA would require extensive redevelopment efforts to expand the current CDCO Security SIEM architecture. Other SIEM devices and solutions will not communicate the same way as the QRadar architecture, which IBM QRadar owns and developed. The way each event collector and processor operates and transmits metadata to the console is not a function that is interchangeable between other SIEM architectures except for QRadar. The estimated cost for a SIEM retool would be over \$3 million for materials and equipment, \$100,000 for VA staff training to learn how to use the new application.

Additionally, only QRadar SIEM appliances and QRadar software license upgrades can meet the following functional requirements needed:

- Browser based monitoring console that is configurable and distributable by user roles
- Agent-less deployment as well as have an auto discovery for network assets and
  process for network assets, compress data stored as well as transmit metadata
  between the collectors and console, raw data transmits is not expected to
  introduce new network bandwidth loads, metadata needs to be encrypted
  between collectors and main console and only transmit the deltas, RAW data
  access needs to be available on the collectors for deep analysis at any given
  point from the metadata information without additional steps of RAW data imports
- Ability to collect logs from various systems and formats, including International Business Machines (IBM) zVM and zOS operating systems, VMware virtual network flow not found in syslog events, but found between vSwitches on Host systems hosting virtual machines
- Customizable for new log formats
- Ability to store 6 years of logs, licensing does not need to know hosts/IP's and is device number dependent. The licensing model must be based on events per second or events per minute, volume licensing at the hardware side in increments

 Malware detection based on behavioral baselines and not signature-dependent allowing for deep analysis and no reliance on operating system maintenance or management

A decision to use another SIEM solution would require the current QRadar devices to be removed from each CDCO ITC, production use stopped, and then a plan to install replacement of SIEM devices for five ITCs. Each center's deployment includes network devices and additional licensing. The existing investment is \$1.5 million for Austin, \$1 million for Philadelphia, which includes the disaster recovery site with duplicate console hardware, and \$800K for the Hines data center. Additionally, CDCO IT security staff would have to spend approximately one year to retrain VA personnel to use the different SIEM architecture while removing the current QRadar to keep current IT security functions going (and not introduce gaps.) Furthermore, VA technical experts estimate it would require approximately 1.5 man-years of effort to replace and retool the current production QRadar SIEM architecture.

Finally, only a reseller of QRadar products can provide the warranty/maintenance required by VA. In order to ensure the aforementioned brand name items remain operational, any source must have extensive knowledge of the brand name items and access to its proprietary technical data in order to provide effective solutions to any maintenance required. Only authorized resellers can meet that requirement.

- 6. Efforts to Obtain Competition: Government technical experts performed internet searches and reviewed market literature in order to find additional products that can provide similar functionality as the QRadar products and maintenance. None were found that would provide the functionality described in Section 5. In accordance with FAR 5.301 and 16.505(b)(2)(D)(1)(i), this action will be synopsized at award on the Federal Business Opportunities Page and the justification will be made publically available.
- Actions to Increase competition: In order to remove or overcome barriers to competition in future acquisitions for this requirement, the agency will perform additional market research so that other solutions can be considered.
- 8. Market Research: The Government's technical experts performed market research between January 2011 through March 2012 by researching other similar solutions (online and through market literature) to learn if other brand items could meet and be compatible with VA's existing architecture (considering connectivity, licensing and management.) The Government's Information Technology (IT) Security technical experts reviewed similar solutions from the following companies: NitroSecurity, eiQnetworks and Sensage. The items did not meet VA's requirements. None of the appliances reviewed will be able to work with current architecture, connectivity, licensing and management within the CDCO's production QRadar SIEM architecture and configuration. Additionally, none of the appliances reviewed met VA's specific functional requirements detailed in paragraph 5. Based on this market research, the Government's technical experts have concluded that only the QRadar brand name

## QRadar Security Information and Event Management Appliances Control Number: 12-055

appliance and software will meet AITC SOC's requirements for its central management of IT security operations requirements for its five ITCs.

- 9. Other Facts: None
- 10. Technical and Requirements Certification: I certify that the supporting data under my cognizance, which are included in this justification, are accurate and complete to the best of my knowledge and belief.

Benito Urbina	Date: 8-15-20/2
Project Manager	Signature:

11. Fair and Reasonable Cost Determination: I hereby determine that the anticipated price to the Government for this contract action will be fair and reasonable. Prices contained in contracts awarded on NASA SEWP IV GWAC have already been determined to be fair and reasonable. As there are multiple vendors on NASA SEWP IV GWAC, additional price competition is anticipated. Finally, the successful quotation will be compared to the independent government cost estimate

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Daniel Winterroth	Date: 8/14/17
Procuring Contracting Officer	Signature: / Janual Lan Cerco

12. Contracting Officer Certification: I certify that this justification is accurate and complete to the best of my knowledge and belief.

Daniel Winterroth

Procuring Contracting Officer

Signature: 13. Legal Sufficiency Certification: I have reviewed this justification and find it adequate to support an exception to fair opportunity and deem it legally sufficient.

Christopher Tiroff Legal Counsel

QRadar Security Information and Event Management Appliances
Control Number: 12-055

## Approval

In my role as Contracting Activity Competition Advocate, based on the foregoing justification, I hereby approve a Firm-Fixed-Price Delivery Order issued under the National Aeronautics and Space Administration Solutions for Enterprise-Wide Procurement IV Government-Wide Acquisition Contract to acquire QRadar Security Information and Event Management appliances, associated software license upgrades, and warranty maintenance. This action will be issued as an exception to fair opportunity as specified by FAR 16.505(b)(2)(i)(B), subject to availability of funds, and provided that the property and services herein described have otherwise been authorized for acquisition.

Date: 9/4/12

Signature: Weld

ris B. Cooper

Head of the Contracting Activity

## Justification For An Exception To Fair Opportunity Coordination Matrix

12-72	8/28/12	
Ronald J. Bakay	Date/ /	Concur/Non-Concur
Competition Manager		
Technology Acquisition Center (003B2) Office of Acquisition Operations		
Department of Veterans Affairs		
AT ITA		
Weller	8-17-2012	
David Peterson	8-17-2012 Date	(Concur/Non-Concur
Deputy Director		
Acquisition Service - Austin		
Technology Acquisition Center (003B2H) Office of Acquisition Operations		
Department of Veteran Affairs		
Greg Hamber	3-17-2012	
Greg Hamberg	Date	Concur/Non-Concur
Director		
Acquisition Service - Austin		
Technology Acquisition Center (003B2H)		
Office of Acquisition Operations Department of Veteran Affairs		
Department of Veteran Anano		
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Michael & Joseph	8.31.2012	Concur/Non-Concur
Michele R. Foster Deputy Associate Executive Director	Date	Concumven-Concu
Technology Acquisition Center (003B2A)		
Office of Acquisition Operations	n	
Department of Veterans Affairs		
Wendy J McCutcheon	Date	Concur/Non-Concur

Wendy J. McCutcheon Associate Executive Director Technology Acquisition Center (001 AL-A3) Office of Acquisition Operations Department of Veterans Affairs